

**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN
DISTRICT OF ILLINOIS EASTERN DIVISION**

JTLE INVESTMENTS LLC (d.b.a. Hang Smart),

Plaintiff,

v.

Case No.: 1:25-cv-2061

SHENZHEN HEROFUN BIO-TECH CO.,
LTD, dba HEROFUN US,

Defendants.

DECLARATION OF LEERON COHEN

I, Leeron Cohen, declare and state as follows:

1. This declaration is based upon my personal knowledge of the facts stated herein or on the business records that were made at the time or in the regular course of business. If called as a witness, I could and would testify to the statements made herein.
2. I am Chief Marketing Officer and Co-Founder of JTLE INVESTMENTS LLC (d.b.a. Hang Smart) (“Plaintiff” or “Hang Smart”). I am knowledgeable of or have access to business records concerning all information referenced herein, including, but not limited to, U.S. Patent No. D887, 255 S (the “Hang Smart Patent) and The Hang Smart TV Mount. I am intimately familiar with Hang Smart Products and make this declaration from matters within my own knowledge save where otherwise stated.
3. I have attached a detailed breakdown of the similarities between **BenHeroFun's** Amazon listing and **HangSmart's** Amazon listing, clearly showing an attempt to confuse consumers and of copying:

(a). Product Design Similarities: (See Exhibit A, Reference PDF slide 1)

- The **shape, contour, and hook design** of BenHeroFun's wall mount is almost identical to the HangSmart mount.
- They use the same number of mounting holes in the exact same positioning (two upper holes, one lower centered hole), which is a distinctive part of HangSmart's patented design and which is necessary to the use of the Color Guide.
- The hooks have the same curved design and size proportions as HangSmart's mount hooks.
- As mentioned previously, while there may be slight differences, the **overall appearance, shape arrangement, hole configuration, packaging, and presentation** were copied to confuse consumers. The focus here is not just patent design similarity, but trade dress infringement and unfair competition.

(b). Color Guide Copying: (Ref. PDF slide 2)

- Both listings feature a **multi-color printed measuring guide (ruler)** with clear color-coded zones that match mounting hole distances and alignment instructions.
- The **placement of color blocks** and the step-by-step visuals of "the hanging process" are practically identical to HangSmart's guide presentation.
- The use of colored indicators (blue, red, green, yellow sections) arranged in the same sequence is a direct replication of HangSmart's proprietary color guide concept.
- Overall there is not a color guide/template of this nature with this design that exists on the market before we designed it and offered it for sale in 2022.
- The color guide is a necessary element to hang the televisions and cannot be used unless with the product that has the three holes which align on the color guide to ensure an effective hang.

(c). **Packaging Copying:** (Ref. PDF slide 3)

- Their product packaging design **mimics HangSmart's box layout**, including:
 - A product photo on the front of the box with the same mounting demonstration.
 - Bold text highlighting "**No Studs Required**" and "**Easy Install**" in the same placement and font styling as HangSmart.

(d). **Instruction Manual Visual Copying:** (Ref. PDF slide 4)

- The infographic showing **Step 1-4 instructions** uses the same order of operations, same illustration style, and same graphic layout, with identical instructions:
- Their diagrams replicate HangSmart's distinctive measurement style and instructional clarity.
- Their "What's in the box"/ User Manual" design layout copies HangSmart's hardware spread format, using identical labeling style, hardware kit display, and bolt variety arrangement.
- The ruler, level, hooks, and even rubber spacers are presented in the same linear format seen in HangSmart marketing materials.

(e). **Video duplication:** Our video can be found on the web at

<https://www.youtube.com/watch?app=desktop&v=jnZDYIvwrLg>. Defendant's video is no longer on their Amazon page, but they copied the exact **visual presentation from our videos**. In the animation video, you can see a side-by-side comparison as they copied our installation visual presentation shot for shot. (See PDF ref slide 5)

(f). **Marketing and Terminology Copy:**

Phrases such as:

- "Holds up to 150 LBS & 100" TV"

- "No Stud or Drilling Needed"
- "Easy Install / Do It Yourself"
- "Includes all necessary hardware"

... are all taken verbatim or near-verbatim from HangSmart's listings and marketing language.

- The use of identical bullet-point structures in the "About This Item" section mirrors HangSmart's layout and phrasing.

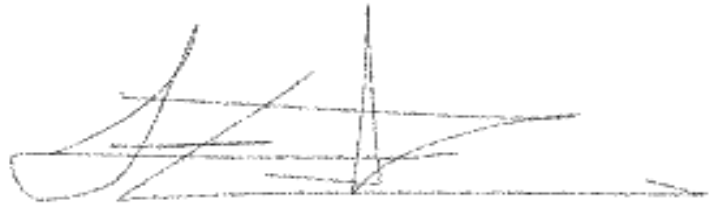
4. Our website (<https://hangsmart.com>) and all associated content — including text, images, design elements, and product visuals — are protected under DMCA.com. Attached is the certificate confirming active protection, domain ownership verification, and registration in their database. This third-party verification further establishes the originality of our marketing materials and intellectual property, which have been copied and misused by the defendant. See Exhibit B.

5. Our copyright registration for the Hang Smart Magic Color Guide is still pending and under review at the U.S. Copyright Office, Correspondence ID: 1-6PUD9ZO.

6. While there may be slight differences, the **overall appearance, shape arrangement, hole configuration, packaging, and presentation** were copied to confuse consumers. I've provided evidence of customer interactions with our brand portraying customer confusion thinking they saw our product cheaper on Amazon. Potential customers would see our ads, and then check Amazon to which they encounter BenHeroFun, which is listed cheaper than ours to gain a competitive advantage. (See PDF ref slide 6)

I declare until penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed the 20 day of March , 2025.

A handwritten signature in black ink, appearing to read 'LEERON COHEN', written over a horizontal line.

LEERON COHEN